

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

GARY KESLER	)	
	)	
REBECCA SUE KESLER	)	
	)	
ERIC KESLER	)	
	)	
CHAD KESLER	)	
	)	
DONNA SUE TAYLOR, AS	)	
TRUSTEE OF THE GARY LEE &	)	
REBECCA SUE KESLER	)	
REVOCABLE LIVING TRUST	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:23CV00164
	)	
TYSON FOODS, INC.	)	
TYSON CHICKEN, INC.	)	
TYSON SALES &	)	
DISTRIBUTION, INC	)	
	)	
MARK AVERY	)	
	)	
KRISTI SANDERS	)	
	)	
Defendants	)	

MOTION FOR LEAVE TO FILE  
MOTION TO REMAND WHICH EXCEEDS PAGE LIMITATIONS

COMES NOW Plaintiffs, by and through their attorney of record, Russell D. Oliver, and request of this Court leave to file their Motion to Remand which exceeds the page limitation of Eastern District Local Rule 4.01(D). The attorney for Plaintiffs state the basis of this request is that the Defendants Notice of Removal raised numerous and multifarious points that each need to be addressed in Plaintiffs responsive motion that could not be adequately expressed within the 15 page limitation of Rule 4.01(D).

WHEREFORE, Plaintiffs pray of this Court for leave to file their Motion to Remand that exceeds the page limitations of Local Rule 4.01

Respectfully Submitted,

/S/ RUSSELL D. OLIVER  
RUSSELL D. OLIVER #59394  
The Oliver Firm, L.C.  
1402 N. Outer Rd, Ste. A  
Dexter, MO 63841  
(573) 614-7959  
[russ@oliver-lawfirm.com](mailto:russ@oliver-lawfirm.com)  
ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2023, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system which sent notification to all parties entitled to service.

/s/ RUSSELL D. OLIVER  
Attorney for Plaintiffs